

### **IN THE DRAWINGS**

Please cancel sheet 2 of the formal patent drawings filed with the subject U.S. patent application and consisting of Figs. 2 and 3. Please replace cancelled sheet 2 of the drawings with the accompanying Replacement Sheet, also sheet 2 and also consisting of Figs. 2 and 3.

## **REMARKS**

Applicants, their principal representatives in Germany, and the undersigned have carefully reviewed the first Office Action on the merits of December 27, 2007, in the subject U.S. patent together with the prior art cited in the rejections of the claims. In response, the specification, drawings and claims of the application, as filed, have been amended. It is believed that the claims now pending in the subject invention are patentable over the prior art cited and relied on, taken either singly or in combination. Reexamination and reconsideration of the application and allowance of the claims now pending in the application is respectfully requested.

The application, as filed, included claims 24-43. Of those, claims 24, 25 and 26 were all independent. Claim 24 was directed to a method of producing a printed product. Claim 25 was directed to a processing device. Claim 26 was directed to an installation for producing printed materials. While the first Office Action was directed to the merits of all three of the independent claims, as well as to the claims that depended therefor, it has now been decided to limit the protection sought in the subject application to the processing device recited in independent claim 25 and the claims that depend from it. Independent claims 24 and 26, and the claims that depend therefrom have been cancelled in this application. Such cancellation is not to be construed as an abandonment of the subject matter of these claims. Applicants expressly reserve the right to file one or more continuation applications directed to the subject matter of these claims.

As described in the Substitute Specification, as filed, and as amended, as depicted in the drawings, as filed, and as amended, and as recited in currently amended

claim 25, the subject invention is directed to a processing device for a web-fed printing press. That processing device is depicted in Figs. 2 and 3 of the drawings, as filed, and as amended by the present Amendment. The purpose of the processing device is to receive previously printed web rolls 12a and 12b in unreeling devices 13a and 13b. These previously printed web rolls 12a and 12b are the rolls 12 of finished printed webs that are produced by the web-fed printing press which is depicted in Fig. 1. Essentially, the processing device of Figs. 2 and 3 receives the previously printed web rolls 12a and 12b, unreels them, properly tensions and registers them, longitudinally separates them into partial webs and assembles the printed webs into either folded products or into cut sheets.

The benefit of the processing device, in accordance with the present invention, is discussed at several locations in the Substitute Specification. The previously printed web rolls 12a and 12b could contain editorial components, advertising supplements, regional news or any other type of printed content that is not as time-sensitive as the rest of the content of a daily newspaper. These less time-sensitive materials can be printed while the web-fed printing press depicted in Fig. 1 would otherwise be underutilized, such as during the middle of the day, after the day's paper has been printed and before the next day's paper has been composed. These less time-sensitive, printed web rolls can be supplied to the processing device of the present invention where they can then be assembled, by themselves, into newspaper sections or inserts. Alternatively, one or more of the previously printed, less time-sensitive rolls can be combined, in the claimed processing device, with other just-printed web rolls, which contain the more sensitive components of a newspaper. A Sunday edition of the

Washington Post would be a good example of a production situation in which the processing device, in accordance with the present invention, could be utilized in a beneficial manner.

In claim 25, as amended, there is recited the processing device depicted in Figs. 2 and 3, as filed, and as amended. The processing device includes at least first and second unreeling devices 13a and 13b which are reel changers that are used to unwind previously imprinted and rewound webs of material. These are depicted at 12a and 12b in Figs. 2 and 3 and are the rolls of finished printed web 12 prepared by the web-fed printing press of Fig. 1.

Each of the unreeling devices 13a and 13b is provided with its own separate position-controlled electric drive mechanism. Paragraph 019 of the Substitute Specification has been amended to include this language. The electric drive mechanisms are now depicted at 10a and 10b in Fig. 3 of the Replacement Sheet of drawings. A control device is provided for each of the electric drive mechanisms and is usable to maintain registration of the unwound, previously printed and rewound webs of material. This language has also been added to paragraph 019 of the Substitute Specification. Fig. 3 of the drawings has been amended to show these control devices 20a and 20b, as well as the electric drive mechanisms 10a and 10b.

The addition of the language of claim 25, as filed, to the Substitute Specification, does not constitute any new matter. Claim 25 was set forth in the Preliminary Amendment which was filed with the application. In addition, the verified translation of the German language text of the PCT application PCT/EP2004/050522, and which constituted the specification and claims of the subject U.S. patent application, contained

similar language. Claim 3 of the verified translation is generally equivalent to claim 25 with the exception of the electric drive mechanism and the control devices. Those aspects of the invention are recited in claims 17 and 18 of the verified translation. Since the original claims are a part of the disclosure of the invention, as filed, the addition of the language of claim 25 or of now cancelled claims 3, 17 and 18 into the Substitute Specification is not new matter. The addition provides proper antecedent basis for the terminology set forth in the claims. The addition of appropriate reference numerals and associated lead lines to the drawings is also not new matter.

During the review of the Substitute Specification, several minor errors of a typographical nature were also noted. These have been corrected. Their corrections do not constitute any new matter.

Returning to a review of claim 25, a draw-in unit 14a and 14b is located downstream, in a direction of web travel, of each of the unreeling devices 13a, 13b. A longitudinal web cutting device 18a or 18b is arranged directly after each of the draw-in webs. The longitudinal web cutting devices act on the webs 16a, 16b that are unwound off the previously printed web rolls 12a, 12b. Once the web or webs are longitudinally cut into one or more partial webs, and not each of the webs is necessarily cut into partial webs, the webs are directed to a turning bar arrangement 21. Here, the partial webs and/or webs are arranged in layers so that they can be formed, cut transversely and folded to produce a printed product. The formers are depicted at 24 and 26, the folders at 22 and 23. The finished printed product can be removed from the processing device by the use of one or more conveyor belts, as is also depicted in Fig. 3.

In the first Office Action of December 27, 2007, the specification was objected to as failing to provide proper antecedent basis for the claimed subject matter. With respect to claim 25, it was asserted that there was no antecedent basis for the recitation of a position-controlled electric drive mechanism for each of the roll changers. That objection to the specification has been discussed in a prior section of this Amendment. It is believed that the Substitute Specification, as amended, provides appropriate antecedent basis for the language of the claims now pending. Claim 34 has been cancelled. The objection to the specification on the basis of the claimed subject matter of claim 34 is rendered moot by the cancellation of that claim. The Examiner's supposition that "web changer" should have been "web dryer" is correct.

Claims 24, 27 and 28 were rejected under 35 USC 103(a) as being unpatentable over a combination of three patents. Since those claims have been cancelled, no further discussion of that rejection is believed to be required. Claims 26, 32 and 33 were also rejected under 35 USC 103(a) as being unpatentable over a combination of two references, not used in the rejection of claim 24. Again, the cancellation of those claims renders that rejection moot.

Of the claims now pending in the application, independent claim 25 was rejected under 35 USC 103(a) as being unpatentable over U.S. patent No. 6,360,665 to Hartmann in view of U.S. patent No. 7,243,827 to Lehrieder and further in view of U.S. patent No. 6,705,982 to Cole. It was asserted that Hartmann shows the processing device of claim 25 with the exception of a separate position-controlled electric drive mechanism for each roll changer and a control device for the electric drive mechanism. Lehrieder was cited as showing such a position-controlled electric drive mechanism and

a control device. Hartmann was also admitted as failing to show a former, a transverse cutting device and a folder. The other secondary reference to Cole was cited as showing such structure. It was asserted that it would thus be obvious to combine the teachings of Hartmann, Lehrieder and Cole to render obvious the subject invention. The undersigned respectfully disagrees.

Initially, it is to be remembered that claim 25 is directed to a processing device of a web-fed printing press. It is not directed to a web-fed printing press. The Hartmann reference is directed to a web-fed printing press. In the Hartmann device, as depicted in the sole drawing figure, there are depicted a pair of unrolling devices 1 and 2. However, unlike the unreeling drives recited in currently amended claim 25, which unwind a previously imprinted, rewound web, the unrolling devices 1 and 2 of Hartmann support paper webs 3, 4 which are to be printed. The paper webs 3, 4 of Hartmann are directed through draw-in devices 8 and 9 and are then directed to print units 11-14. The device described in the Hartmann reference is thus similar, to this point, to the web-fed printing press of Fig. 1 of the subject application. It is not similar to the processing device recited in currently amended claim 25.

The webs, which are printed in the print units 11-14 of Hartmann are then directed to a turning bar deck, generally at 16. This turning bar deck 16 includes a total of six levels 21-26. Each of these levels has its own longitudinal cutting device 28.

Once the webs 3, 4, 33, 34, 36 and 37 of Hartmann have been printed in the printing units and have been fed through the turning bar deck 16, they are then folded longitudinally using a longitudinal folding device 43. A folding cylinder group 46 then receives the webs.

Each level 21-26 of the turning bar deck 16 of Hartmann includes sensors 58-69 at the exit end of each deck level. These sensors are discussed at Column 3, lines 38-43. They are used to determine whether or not the print image is located in the correct position. In other words, these sensors 58-69, which are located at the exit of the levels of the turning bar deck 16, check for image registration. If there is a registration error, the print unit 11 is advanced or retarded.

Reviewing the characterization of the Hartmann reference in the Office Action, several incorrect assertions are noted. Initially, Hartmann is not a processing device of a web-fed printing press; it is a web-fed printing press. The roll changers are not used to unwind imprinted webs of material. Instead, they are used to unwind webs of material which will subsequently be printed in the printing units 11-14. Hartmann does not show a longitudinal cutting device located directly after each draw-in unit, as recited in claim 25, as filed and as amended. Instead, Hartmann shows longitudinal cutting devices that are located after the print units 11-14, which print units 11-14 are located after the draw-in units.

It is agreed that, in addition to its other failings, that Hartmann fails to teach or suggest a separate position-controlled electric drive mechanism for each roll changer and a control device to control the electric drive mechanism to maintain registration of the unwound, previously registered and rewound web of material as that previously imprinted, rewound web of material is unwound by the unreeling device. The secondary reference to Lehrieder, which is relied on to provide such a teaching does not provide that teaching and is not properly combinable with the Hartmann device.



In Hartmann and in the subject application, there are recited draw-in devices. As that term is used in those two contexts, they both mean a device, typically a pair of cooperating rollers, that engages a web across its width and pulls it off a roll. In the Lehrieder patent, the term draw-in mechanism means an entirely different thing. When a web-fed printing press is to be put into operation, the web of material that is to be printed must be fed from the supply reel, along the path of web travel, to the end of the printing press. The web is not self feeding. It cannot be merely introduced at the inlet and be expected to exit at the proper location. It has to be guided along the path of travel that it is to follow. This is done by using a draw-in mechanism. In the Lehrieder device, a metal tape 22 is wound in a reel body 13 and can be pulled out of that reel body 13 and back through the printing press 01. The end of the tape that is most remote from the reel body 13 is connected to a leading end of a paper web from a reel changer 04, 06, 07.

In Lehrieder, a drive motor 17 controls the rotation of the reel body 13. As the effective diameter of the reel body 13 increases, as the metal tape 22 is wound back up onto the reel body 13, the result is a change in the linear speed of travel of the remote end of the metal tape 22 to which the leading end of the paper web has been attached. As the effective reel body diameter increases, so does the linear travel speed of the remote end of the metal tape 22. This can put undue stress on the paper web, causing it to rip or tear. To counteract the problem, the electric motor 17 can be controlled so that the reel body rate of rotation will decrease, with increasing reel body diameter, so that the linear rate of travel of the remote end of the steel tape 22 remains the same.

The position-controlled electric drive mechanism of Lehrieder is used in connection with a web draw-in device. However, as discussed above, that draw-in device is not remotely similar to the draw-in device of Hartmann or of the present invention.

If Lehrieder and Hartmann were to be combined, the result would be to have two separate, distinct draw-in devices. The Hartmann draw-in device 8 or 9 would be used to pull a web off a roll supported on one of the unrolling devices 1 or 2. The Lehrieder draw-in device would be situated someplace after the turning bar deck 16 and would be used to pull a leading end of one of the webs 3 or 4 from the roll, through the Hartmann draw-in device 8 or 9, through the Hartman print units 11-14 through the turning bar deck 16 and to a point adjacent the longitudinal fold former 43. The Examiner's attention is directed to the location of the reel body 13 of Lehrieder, adjacent to the longitudinal fold former 05. The electric motor 17 of Lehrieder is controlled to provide a uniform linear speed of travel of the steel tape 22. There is no teaching or suggestion in Lehrieder that the electric motor 17, which is used to rotate the reel body 13, could be usable for a completely different purpose in Hartmann, to attain a completely different result. Perhaps even more importantly, the webs 3 and 4, which are being unrolled off the rolls supported by the unrolling drives 1 and 2 of Hartmann, have not been printed, and will not be printed until they pass through the print units 11-14. Accordingly, there is no reason to provide such position-controlled electric drive motors for the unrolling devices of Hartmann, as is recited in currently amended claim 25. The control devices for these motors, as is also recited in claim 25, are usable to control the motors to control registration of the unwound, previously-imprinted and rewound webs of material.

In Hartmann, the webs 3 and 4 are not yet printed when they pass through the draw-in units 8 and 9. Accordingly, there is no need to maintain registration in the Hartmann unrolling devices.

Claim 25 further recites at least one former, at least one transverse cutting device and at least one transverse folder, all after the turning bar arrangement. In the rejection of claim 25, it was asserted that Hartmann failed to provide such a teaching and that the Cote reference had to be relied on. In fact, Hartmann shows a longitudinal fold former at 43 and a folding cylinder group 46. It is admitted that such a folding cylinder group 46 would be expected to include a transverse cutting device and a transverse folder. The addition of the Cote reference is thus not necessary.

The fact remains that Hartmann and Lehrieder are not directed to processing devices, as that term is used in the subject application. They are both directed to generally conventional printing presses that include printing units interposed between unrolling devices and a fold former. The device of claim 25 does not include any printing units. It effects registration of the previously printed webs, at the time of unreeling those webs, by control of the drive mechanisms for the unreeling devices. Hartmann controls registration of the webs, after they have been printed in the printing units 11-14, by control of the printing units. Lehrieder does not provide any teaching or discussion of registration control. It is thus quite clear that claim 25, as currently amended, is not rendered obvious by the asserted combination of Hartmann and Lehrieder. The combination of these two references would not result in a device that would be similar in either structure or function to the processing device that is recited in currently amended claim 25.

Claims 36 and 41-43 depend from believed allowable, currently amended claim 25. They are also believed to be allowable. The secondary references cited and relied on to show the individual aspects of those dependent claims does not teach or suggest the structure recited in currently amended claim 25. In addition, the reliance on a four or five reference combination to assert that claim features are "obvious" is strong evidence of a hindsight rejection.

The various other references cited in the Office Action, but not utilized in the rejections of the claims currently pending in the subject application, have been noted. Since they were not so applied, no further discussion thereof is believed to be required.

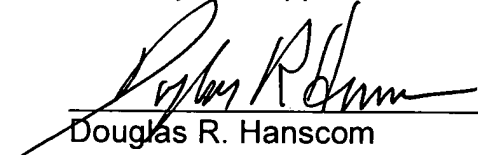
## SUMMARY

The Substitute Specification and drawings have been amended to provide proper antecedent basis for claim language. These changes do not constitute any new matter. Several of the independent claims, and their associated dependent claims have been cancelled. All of the claims now pending in the application have been amended to more clearly patentably define the subject invention over the prior art cited and relied on. Allowance of the claims, and passage of the application to issue is respectfully requested.

Respectfully submitted,

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